

NICHOLAS A. TRUTANICH
United States Attorney
District of Nevada
Nevada Bar Number 13644
NICHOLAS D. DICKINSON
Assistant United States Attorney
501 Las Vegas Boulevard South
Suite 1100
Las Vegas, Nevada 89101
(702) 388-6300 / Fax: (702) 388-6698
Nicholas.dickinson@usdoj.gov

Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

-oOo-

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAMAL RASHID,

Defendant.

2:19-cr-00246-GMN-NJK

STIPULATION TO SENTENCING
(Second Request)

IT IS HEREBY STIPULATED AND AGREED, by and between, the United States of America, through the undersigned, together with David Chesnoff, Esq. and Richard A. Schonfeld, Esq., counsel for defendant Jamal Rashid, that the sentencing hearing currently scheduled for March 27, 2020 at 10:00 a.m., be vacated and set to a date and time convenient to this Court, but no sooner than 30 days on a date that is on a Friday.

This stipulation is entered into for the following reasons:

1. The Defendant is not incarcerated does not object to the continuance.
2. In response to the Presentence Report, counsel for defendant requested additional discovery that falls under Federal Rule of Criminal Procedure 6(e). The parties agreed

1 on production of those materials and counsel needs additional time for potential
2 objections to the PSR.

- 3 3. Government counsel will be out of the District on March 27, 2020, on mandatory
4 work related travel.
- 5 4. Counsel Chesnoff is currently in trial in a several month special circumstances
6 homicide trial in Los Angeles, with the court being dark on Fridays only.
- 7 5. Both parties anticipate filing sentencing memorandums and the parties need
8 additional time to prepare for defendant's Sentencing.
- 9 6. The parties agree to the continuance.
- 10 7. Additionally, denial of this request for continuance could result in a miscarriage of
11 justice.
- 12 8. The additional time requested by this Stipulation is made in good faith and not for
13 purposes of delay.

14 This is the second request for a continuance of the sentencing hearing.

15 DATED this 11th day of March, 2017.

16 DANIEL G. BOGDEN,
17 United States Attorney
By: /s/ Nicholas D. Dickinson
18 NICHOLAS D. DICKINSON
Assistant United States Attorney

By: /s/ Richard A. Schonfeld
DAVID Z. CHESNOFF, ESQ.
RICHARD A. SCHONFELD, ESQ.
Counsel for Jamal Rashid

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
-oOo-**

UNITED STATES OF AMERICA,

2:19-cr-00246-GMN-NJK

Plaintiff,

vs.

ORDER

JAMAL RASHID,

Defendant.

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy sentencing, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for sentencing, taking into account the exercise of due diligence.

IT IS THEREFORE ORDERED that sentencing in the above-captioned matter currently scheduled for March 27, 2020 at 10:00 a.m., is VACATED and CONTINUED to Friday, May 1, 2020, at 9:00 a.m. in Courtroom 7D before Judge Gloria M. Navarro.

DATED March 12, 2020


THE HONORABLE GLORIA M. NAVARRO
U.S. DISTRICT COURT JUDGE